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f/k/a Adamar of New Jersey, Inc. and
Manchester Mall, Inc., Debtors

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
HONORABLE JUDITH H. WIZMUR
CASE NO. 09-20711 (JHW)

In re:

ADAMAR OF NJ IN LIQUIDATION, LLC,

Debtors.

Chapter 11

**DEBTORS' MOTION PURSUANT TO
SECTIONS 1112(b), 105(a) AND 305(a)
OF THE BANKRUPTCY CODE FOR AN
ORDER DISMISSING THEIR CHAPTER
11 CASES AND GRANTING RELATED
RELIEF**

HEARING DATE AND TIME:

May 18, 2011, at 9:30 a.m.

ORAL ARGUMENT REQUESTED

TO: All Parties-in-Interest

PLEASE TAKE NOTICE that on May 18, 2011, at 9:30 a.m., or as soon thereafter as counsel may be heard, Adamar of NJ In Liquidation, LLC, f/k/a Adamar of New Jersey, Inc., d/b/a Tropicana Casino & Resort - Atlantic City and Manchester Mall, Inc. (collectively, the "Debtors"),¹ by and through their counsel, Cole, Schotz, Meisel, Forman & Leonard, P.A., shall

¹ In accordance with the Amended Agreement (defined in the Motion (defined below)) and the Court's Order approving same, Adamar of New Jersey, Inc. and Manchester Mall, Inc. merged into Adamar of NJ In Liquidation, LLC. All three entities are collectively referred to herein as the "Debtors" for purposes of convenience.

move before the Honorable Judith H. Wizmur, at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, New Jersey 08101, for entry of an Order pursuant to Sections 1112(b), 105(a) and 305(a) of Title 11 of the United States Code (the “Bankruptcy Code”) for an Order Dismissing Their Chapter 11 Cases and Granting Related Relief (the “Motion”).²

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Application, which sets forth the relevant factual and legal bases upon which the requested relief should be granted. A proposed form of Order granting the Motion also is submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing, (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents dated March 27, 2002 (the “General Order”) and the Commentary Supplementing Administrative Procedures dated as of March 2004 (the “Supplemental Commentary”) (the General Order, the Supplemental Commentary and the User’s Manual for the Electronic Case Filing System can be found at www.njb.uscourts.gov, the official website for the Bankruptcy Court) and, by all other parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance with the General Order and the Supplemental Commentary, so as to be received no later than seven (7) days before the hearing date set forth above.

² All capitalized terms used but not otherwise defined herein shall have the same meaning ascribed to them in the Application submitted in support of the Motion.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a), and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument on the return date of the Motion.

COLE, SCHOTZ, MEISEL,
FORMAN & LEONARD, P.A.
Attorneys for Adamar of NJ In Liquidation, LLC,
f/k/a Adamar of New Jersey, Inc. and
Manchester Mall, Inc., Debtors

By: /s/ Ilana Volkov
Michael D. Sirota
Ilana Volkov

DATED: April 28, 2011